

EXHIBIT B

(December 19, 2022 Letter from David Addington)

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December 19, 2022

BY E-MAIL ONLY

Mr. Thomas B. Rupp
650 California Street, Suite 1900
San Francisco, CA 94108
trupp@kbklp.com

RE: Proof of Claim 108715

Dear Mr. Rupp,

I am writing in response to your letter of December 16, 2022.

Second Amended Proof of Claim

I intend to file a second amended proof of claim based on the document production recently made by PG&E. While I had made many requests for these documents directly to PG&E over the years, they had refused my requests (or refused to respond at all). As new information becomes available, I feel it necessary to modify the proof of claim to reflect that information.

I am sensitive to your concerns regarding timing and will endeavor to get you a draft of the proposed amendment as soon as possible. I could get you a well reasoned proposed amendment by January 16, 2023. Would this work with your calander?

Motion for Summary Judgement

I am interested in extending the deadline for response to the motion for summary judgement. As the second amended proof of claim will likely alter the basis for this motion and might make the motion moot, I would like to ask for an additional 60 days to respond, moving the date of response to March 11, 2023. This later response date will allow for PG&E and the court to respond to the Second Amended Proof of Claim before spending time on the Summary Judgement motion that might no longer be necessary.

Outstanding Discovery

I will produce any responsive documents. I was unaware that more documents were expected. Would a prodcution date of January 3, 2023, be acceptable to you?

Events of December 2, 2022

Under the easement, the grantee must make every effort to avoid interfering with the grantor's land use. I believe that such efforts should include scheduling of work. I look forward to speaking with PG&E's representative regarding work scheduled in the future.

I look forward to speaking with you today at 4.

David P. Addington